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Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re

MARTIN CADILLAC, L.L.C.,

Debtor and Debtor-in-Possession.

Chapter 11

Case No. 10-29520 (____)

**NOTICE OF DEBTOR'S EMERGENT MOTION FOR EMERGENT
ORDER AUTHORIZING, PENDING HEARING ON THE DEBTOR'S
FIRST DAY MOTIONS, THE IMMEDIATE USE OF CASH
COLLATERAL AND GRANTING OTHER LIMITED RELIEF
RELATING THERETO**

PLEASE TAKE NOTICE that Martin Cadillac, L.L.C., the above-captioned debtor and debtor-in-possession (the "Debtor"), by and through its proposed counsel, is hereby moving the United States Bankruptcy Court for the District of New Jersey (Newark Vicinage), located at Martin Luther King, Jr. Federal Building, 50 Walnut Street, 3rd Floor, Newark, NJ 07102, for entry of an emergent order, substantially in the form submitted herewith, authorizing, pending the hearing on the Debtor's "first day" motions, the Debtor's immediate interim use cash collateral in accordance with the terms of the proposed emergent order submitted herewith and the operating budget annexed thereto as Exhibit A (the "Emergent Motion").

PLEASE TAKE FURTHER NOTICE that the Debtor shall be relying upon the following in connection with this Emergent Motion:

- (i) the Application submitted herewith in support of the Emergent Motion; and
- (ii) the Declaration of Timothy F. Martin submitted herewith in support of the Emergent Motion.

PLEASE TAKE FURTHER NOTICE that substantially contemporaneously with the filing of this Emergent Motion the Debtor is filing an Application for an Order Scheduling a Hearing on an Emergency and Expedited Basis on Shortened Notice with respect to the Emergent Motion (the "Scheduling Application") in which the Debtor is requesting an immediate hearing date and time for this Emergent Motion.

PLEASE TAKE FURTHER NOTICE that service of the order entered with respect to the Scheduling Application shall provide and constitute notice of the hearing date and time of the Emergent Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's *General Order Adopting Guidelines Governing First Day Matters*, objections (if any) and/or responses (if any) to the Emergent Motion may be filed with the Court at any time prior to the hearing date on the Emergent Motion. The Court may also entertain oral objections (if any) and/or responses (if any) to the Emergent Motion at the hearing.

Dated: June 25, 2010

Respectfully submitted,

OKIN, HOLLANDER & DELUCA, L.L.P.,
Proposed Attorneys for Martin Cadillac, L.L.C.,
Debtor and Debtor-in-Possession

By: /s/ Paul S. Hollander
Paul S. Hollander
Gregory S. Kinois

